

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|----------------------|---|------------------------|
| IN RE: | : | |
| | : | |
| John J. McGinnis | : | Case No.: 19-14860-elf |
| Margaret M. McGinnis | : | |
| | : | |
| Debtor | : | Chapter 13 |

Notice of Motion, Response Deadline and Hearing Date

I, Brad J. Sadek, Esq., attorney for the Debtor in the above captioned matter has filed a Motion to Modify Chapter 13 Plan for the reasons detailed in the enclosed Motion.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one, in this Bankruptcy case. (If you do not have an attorney you may wish to consult and attorney).

1. If you do NOT want the court to grant the relief sought in the motion, then on or before November 10, 2020 you or your attorney must do ALL of the following:
If you mail your answer to the clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and:

- a) File an answer explaining your position at:
United States Bankruptcy Court
Eastern District of Pennsylvania
900 Market Street, Suite 400
Philadelphia, PA 19107
- b) Mail a copy to the movant's attorney:
Brad J. Sadek, Esq.
Sadek and Cooper
1315 Walnut Street, Suite 502
Philadelphia, PA 19107

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief request in the enclosed motion.

3. A hearing on the motion is scheduled to be held before The Honorable Eric L. Frank on **November 17, 2020 at 1:00 PM at The United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19108, Courtroom #1.**

4. You may contact the Bankruptcy Clerks office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

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CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq., certify that on the date indicated below served a true and correct copy of the Debtor's Motion to Modify Chapter 13 Plan and Notice of Motion was served by electronic delivery or Regular U.S. Mail to the Debtor, the Trustee, all secured, priority and affected creditors per the address provided on their Proof of Claims and on the following parties:

William C. Miller, Esq.
Standing Chapter 13 Trustee

Antonio Bonanni, Esq.
Hladik, Onorato & Fedennan, LLP
298 Wissahickon Avenue
North Wales, PA 19454

Carvana, LLC
PO Box 29018
Phoenix, AZ 85038

Dated: October 13, 2020

/s/ Brad J. Sadek, Esq.
Brad J. Sadek, Esquire
Attorney for Debtor
1315 Walnut Street, Suite 502
Philadelphia, PA 19107